

Each of the independent claims 1, 15, 25, and 39 specify that an access router assigns to each *mobile router* a *unique delegated address prefix* for use by the mobile router *within the local mobile network* that is serviced by the access router. Claim 1 is exemplary:

1. A method in an access router, the method comprising:
supplying to a first *mobile router* a *delegated address prefix*, based on attachment by the first mobile router to one of the access router and a second mobile router attached to the access router, *each mobile router in a local mobile network serviced by the access router receiving a corresponding unique delegated address prefix for use within the local mobile network*; and
registering a remote care-of address having the delegated address prefix with a prescribed home agent of the first mobile router, to register a reachability of the first mobile router.

Hence, each of the independent claims 1, 15, 25, and 39 specify that the access router: (1) provides to each *mobile router* in the local mobile network serviced by the access router a *corresponding unique delegated address prefix*; and (2) registers the remote care-of address of the first mobile router (and having the delegated address prefix) with the prescribed home agent of the first mobile router.

As described in the specification, that assignment of the unique delegated address prefix enables each mobile router to use the delegated address prefix as the mobile router moves through the local mobile network, regardless of whether the mobile router changes its point of attachment within the local mobile network; in other words, the mobile router may change its local care-of address based on its point of attachment within the local mobile network, however the use of the unique delegated address prefix enables the mobile router to use the same delegated address prefix (and consequently as described below the same remote care-of address) at the *new* point of attachment within the local mobile network (requiring a new *local* care-of

address). Hence, the mobile routers can move throughout the local mobile network (e.g., 56 of Figs. 3A and 3B) without reassignment of delegated address prefixes (see, e.g., page 8, lines 15-23 and page 11, lines 3-6 of the specification).

Further, the assignment of a delegated address *prefix* to a mobile *router* enables the mobile *router* to establish routing policies, for example security and traffic policies, and assign local care-of addresses to attached nodes using the delegated address prefix.

Further, the registration of the remote care-of address having the *delegated address prefix* by the *access router* eliminates the necessity of sending additional binding updates to the home agent as the mobile router moves throughout the local mobile network, since the mobile router only needs to send a binding update to the *access router* that the corresponding delegated address prefix is reachable via the new local care-of address (see Figs. 3A and 3B and page 13, lines 5-25). The remote care-of address having the delegated prefix address, however, can still be used while the mobile router moves throughout the local mobile network.

Hence, the unique delegated address prefix minimizes the need for binding updates with the corresponding home agent as the mobile router moves within the local mobile network. Moreover, the mobile router can advertise the delegated prefix to other mobile nodes, while maintaining confidentiality of its home network prefix, as well as the confidentiality of visiting mobile nodes that attach to the mobile router by using the delegated prefix for a care-of address.

These and other features and advantages are neither disclosed nor suggested in the applied prior art.

Alriksson provides no disclosure whatsoever of supplying a delegated *address prefix*, let alone to a first mobile *router*; further, Alriksson provides no disclosure or suggestion whatsoever of registering a remote care of address, having the delegated address prefix, *by the access router* to a home agent of the first mobile router. In fact, Alriksson provides no reference whatsoever to any assignment of a delegated *address prefix*.

The cited paragraphs 28-30 provide a description of conventional Mobile IP protocol (admitted by Alriksson as prior art), where every mobile node is assigned a static home address at its home network by a home agent. The home address “allows the mobile node to always be capable of receiving data in the same way as it receives data in its home network” (para. 28, lines 3-5).

Paragraphs 28-30 also describe that the mobile node obtains a care-of address when visiting a foreign network: “[e]ach mobility agent periodically broadcasts agent advertisements to its directly attached subnetworks to advertise its existence. The mobile node listens for these advertisements in order to *select a mobility agent*, i.e., a foreign agent, *through which* the node can register with its home agent.” (Para. 29, lines 8-13).

Hence, paragraphs 28-30 simply describe the conventional Mobile IP procedure that the mobile node registers *through* a foreign agent, i.e., the mobile node registers *with* its home agent to specify that mobile node is reachable via the care-of address that is reachable *by* the foreign agent (“[w]hen the node is successfully registered with the home agent, every datagram sent to the home address of the mobile node is received by the home agent and forwarded to the care-of address, e.g., the foreign agent, that then forwards it to the mobile node. The forwarding is

performed using a method called tunnelling” (Para. 30, lines 1-6)). This very procedure is also described in the subject application in the Background Art section on page 2, lines 6-13.

Hence, Alriksson et al. describes that the mobile node creates a care of address from the advertisement by the mobility agent in the foreign network, and then *the mobile node* registers the care of address with its home agent. This is consistent with Applicant’s admitted prior art describing the same Mobile IP technology (see page 2, lines 9-10: “A home agent is a router on a mobile node's home link with which *the mobile node has registered* its current care-of address.”).

Further, Alriksson et al. provides numerous references to the *visiting mobile node* performing the act of “registering” with the gateway (i.e., foreign agent), but not a single reference of the *gateway* performing any registration. Rather, the gateway is simply the destination endpoint of a tunnel from the home agent to the care-of address for forwarding packets to the visiting mobile node (see, e.g., para. 83 (“The mobile nodes in the ad hoc network that want Internet access use their home addresses for all communication with and *when registering with a foreign agent* ”); para. 116, line 6 (“When *a visiting node registers* with a foreign agent ...”); claim 18, line 2 on page 10 (“when *a node registers* as a visiting node....”)).

Hence, Alriksson neither discloses nor suggests that the *access router* registers the remote care of address of the mobile node; rather, in Alriksson the mobile node itself registers *through* a foreign agent (i.e., *via* a foreign agent) in order to indicate to the home agent that the mobile node is reachable via the foreign agent.

Finally, Alriksson neither discloses nor suggests a remote care of address, but rather describes a conventional "care-of address". The specification distinguishes between "care-of address" as in the prior art (see, e.g., page 2, lines 8-9: "[a] care-of address is an IP address associated with a mobile node that has the subnet prefix of a particular link away from its home link (i.e., a foreign link)") and a **remote** care-of address (e.g., 64a, 64b, 64c of Fig. 3A) that is within the address space of the delegated address prefix (compare with the described **local** care-of address 62a, 62b, 62c that is within the address space of the delegated address prefix of the attachment router).

It is well settled that the term "remote" cannot be disregarded. "All words in a claim must be considered in judging the patentability of that claim against the prior art." *In re Wilson*, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970)." Hence, the Final Rejection is insufficient because Alriksson does not disclose or suggest a **remote** care-of address, as claimed.

Hence, the §102 rejection of claims 1, 15, 25, and 39 should be withdrawn because it fails to demonstrate that the applied reference discloses each and every element of the claim. See MPEP 2131. "The identical invention must be shown in as complete detail as is contained in the ... claim." Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). "Anticipation cannot be predicated on teachings in the reference which are vague or based on conjecture." Studiengesellschaft Kohle mbH v. Dart Industries, Inc., 549 F. Supp. 716, 216 USPQ 381 (D. Del. 1982), aff'd., 726 F.2d 724, 220 USPQ 841 (Fed. Cir. 1984).

The indication of allowable subject matter in claims 2-7, 10, 16-20, 26-31, 34, 40-45, and 48 is acknowledged with appreciation. It is believed these claims are allowable in view of the foregoing.

The allowance of claims 11-14, 21-24, 35-38, and 49-52 is acknowledged with appreciation.

In view of the above, it is believed this application is in condition for allowance, and such a Notice is respectfully solicited.

To the extent necessary, Applicant petitions for an extension of time under 37 C.F.R. 1.136. Please charge any shortage in fees due in connection with the filing of this paper, including any missing or insufficient fees under 37 C.F.R. 1.17(a), to Deposit Account No. 50-1130, under Order No. 10-014, and please credit any excess fees to such deposit account.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'L. R. Turkevich', with a long horizontal stroke extending to the right.

Leon R. Turkevich
Registration No. 34,035

Customer No. 23164
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